

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66

CARYN STRICKLAND,)
)
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA, *et al.*,)
)
Defendants.)

DECLARATION OF ANTHONY MARTINEZ

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am Anthony Martinez, formerly the Federal Defender for the Western District of North Carolina. I testified in the trial of this matter on December 13, 14, and 18, 2023.

2. I have reviewed the transcripts of my trial testimony and I observed certain instances where my actual testimony differed from the testimony reported in the transcript. I offer this declaration to identify those transcription errors.

3. The December 13, 2023 transcript (at 113:1) states: "I graduated from Siena Law School[.]" My actual testimony was as follows: "I graduated from Seton Hall Law School.."

4. The December 13, 2023 transcript (at 115:1-3) states: "So I split the office up into trial teams, an appellate unit, and a trip team, and an administrative unit team." My actual testimony was as follows: "So I split the office up into trial teams, an appellate unit, and an IT team and an administrative team."

5. The December 13, 2023 transcript (at 129:24) states: “Mr. Kaite in the trial unit[.]”
My actual testimony was as follows: “Mr. Tate in the trial unit[.]”

6. The December 13, 2023 transcript (at 137:8 and 10-11) states: “Aaron Johnson.”
My actual testimony was as follows: “Kelly Johnson.”

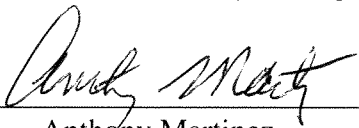
7. The December 13, 2023 transcript (at 144:11-12) states: “Ms. Strickland would be supporting or doing R & W work for JP Davis’s time.” My actual testimony was as follows: “Ms. Strickland would be supporting or doing R & W work for JP Davis’s team.”

8. The December 14, 2023 transcript (at 78:9) states: “Please do not e-mail, text, or meet with him[.]” My actual testimony was as follows: “Please do not e-mail, text, or meet with Caryn[.]”

9. The December 14, 2023 transcript (at 109:25) states: “Nashville[.]” My actual testimony was as follows: “Asheville[.]”

10. The December 14, 2023 transcript (at 110:8-9) states: “If an IT person came in, they would come in through the EDR office.” My actual testimony was as follows: “If an IT person came in, they would come in and share the office.”

Executed this 9th day of August, 2024.



Anthony Martinez